

ANN M. DIGIROLAMO  
UNITED STATES vs STATE OF GEORGIA

July 28, 2022

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,  
Plaintiff,  
vs.  
STATE OF GEORGIA,  
Defendants.  
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) CIVIL ACTION  
) NO. 1:16-cv-03088-ELR  
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)

VIDEOTAPE DEPOSITION OF  
ANN M. DIGIROLAMO

Thursday, July 28, 2022, 3:22 p.m., EST

HELD AT:

Robbins Alloy Belinfante Littlefield LLC  
500 14th Street, N.W.  
Atlanta, Georgia 30318

-----  
WANDA L. ROBINSON, CRR, CCR, No. B-1973  
Certified Shorthand Reporter/Notary Public

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ALSO PRESENT:

BRANDON BRANTLEY, VIDEOGRAPHER

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1 THE VIDEOGRAPHER: This is the video  
2 deposition of Ann DiGirolamo, being taken in  
3 the matter of the United States of America  
4 versus the State of Georgia.

5 Today's date is July 28th, 2022.

6 The time on the record is 3:22 p.m.

7 My name is Brandon Brantley. I'm the  
8 videographer.

9 Wanda Robinson is the court reporter.

10 Counsel, please introduce yourselves for  
11 the record, after which the court reporter will  
12 swear in the witness.

13 MR. HOLKINS: Patrick Holkins for the  
14 United States.

15 MS. COHEN: Francis Cohen for the United  
16 States.

17 MR. BEDARD: Ed Bedard for the State of  
18 Georgia.

19 - - - - -

20 ANN DiGIROLAMO,  
21 being duly sworn, was examined and testified as  
22 follows:

23 - - - - -

24  
25 ///

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1 EXAMINATION

2 BY MR. HOLKINS:

3 Q Good afternoon.

4 A Good afternoon.

5 Q Thank you for coming today.

6 Just for the record, could you please  
7 spell your full name.

8 A Sure. First name Ann, A-N-N. Last name  
9 DiGirolamo, D-I capital G-I-R-O-L-A-M-O. Middle  
10 initial M.

11 Q So just a few instructions before we dive  
12 into questions.

13 The first is just a heads-up that we will  
14 be taking breaks during the deposition at least  
15 every 90 minutes. I anticipate we'll take our first  
16 break around 4:30. If you need a break before then,  
17 please just let us know and we can take a break for  
18 a few minutes. I will ask if there is a question  
19 pending that you first answer the question before we  
20 take a break. Is that okay?

21 A Uh-hum. Okay.

22 Q As you are aware, this deposition is being  
23 recorded, it's being transcribed and video recorded.

24 For clarity of the record, I would ask  
25 that you let me finish my question before you start

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1 your answer. Is that all right?

2 A Yes.

3 Q Please also answer verbally as opposed to  
4 shaking or nodding your head. Is that all right?

5 A Yes.

6 Q It will be helpful, both Frannie and  
7 myself, we've both got hearing loss, as Frannie  
8 mentioned. If you could project and speak up in  
9 your answers.

10 A Okay.

11 Q So I'm going to show you our first  
12 exhibit, which is 333.

13 Give me one second and I'll publish it on  
14 Zoom. Then I'll give you control of the document so  
15 you can scroll through.

16 A Okay.

17 MR. HOLKINS: So I'm publishing Exhibit  
18 333.

19 (WHEREUPON, Plaintiff's Exhibit-333 was  
20 marked for identification.)

21 BY MR. HOLKINS:

22 Q And I'm going to give you control of the  
23 document. You should now be able to grab it and  
24 scroll through it.

25 I ask that you just read the document,

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1 review it, and let me know when you're finished.

2 (Witness reviews exhibit.)

3 A I'm finished.

4 Q Thank you. I'm going to take control of  
5 the document back and I'll scroll up to the first  
6 page.

7 This is the notice of your deposition in  
8 this matter, correct?

9 A Yes.

10 Q Have you seen this document before today?

11 A No.

12 Q Before today, had you heard about this  
13 case?

14 A Yes, briefly.

15 Q And what is your understanding of what  
16 this case is about based on what you heard before  
17 today?

18 A Sure. My understanding is that this is a  
19 case where there's concern that youth placed in  
20 GNETS schools who have emotional and mental health  
21 difficulties and challenges, that there are concerns  
22 that they are being more restricted and that the  
23 suit is against some of the rights for disabilities.

24 Q Were you aware that Dimple Desai was  
25 deposited in this litigation?



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1 A Yes.

2 Q Did you discuss Ms. Desai's testimony in  
3 her deposition before today?

4 A No.

5 Q Did you review the transcript of Ms.  
6 Desai's deposition in this matter?

7 A No.

8 Q Are you aware that Susan McLaren was  
9 deposed earlier today in this matter?

10 A Yes.

11 Q And in the 20 minutes or so between the  
12 finishing of that deposition and the start of this  
13 one, did you discuss with Ms. McLaren her testimony?

14 A No.

15 Q Have you reviewed transcripts of any other  
16 depositions taken in this matter?

17 A No.

18 Q Do you understand that your testimony  
19 today is under oath?

20 A Yes.

21 Q Do you understand that being under oath  
22 means you have an obligation to tell the truth?

23 A Yes.

24 Q Is there any reason why you cannot testify  
25 accurately and truthfully today?

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1 A No.

2 Q Are you taking any medication that would  
3 interfere with your ability to answer my questions  
4 fully and truthfully today?

5 A No.

6 Q Have you ever been deposed before?

7 A No.

8 Q I'd like to run through some acronyms that  
9 we may use today in our questions, just to make sure  
10 that we're on the same page.

11 The first one is "DBHDD." Will you  
12 understand when I use that term I'm referring to the  
13 Georgia Department of Behavioral Health and  
14 Developmental Disabilities?

15 A Yes.

16 Q And will you understand when I use the  
17 acronym "DCH" that I'm referring to Georgia  
18 Department of Community Health?

19 A Yes.

20 Q If I say "DOE," or "GaDOE," will you  
21 understand that I'm referring to the Georgia  
22 Department of Education?

23 A Yes.

24 Q When I reference "CMOs," do you understand  
25 that I mean Care Management Organizations in

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1 Georgia?

2 A Yes.

3 Q Will you understand that "SED" refers to  
4 Serious Emotional Disturbances?

5 A Yes.

6 Q When we use the term "GNETS" in today's  
7 deposition, will you understand that to mean the  
8 Georgia Network for Educational and Therapeutic  
9 Support?

10 A Yes.

11 Q When I use the term "OCYF," or "CYF," will  
12 you under that is a reference to the Office of  
13 Children, Young Adults and Families --

14 A Yes.

15 Q -- in DBHDD?

16 A Yes.

17 Q When I refer to "COE," will you understand  
18 that as meaning the Georgia State University Center  
19 of Excellence?

20 A Yes.

21 Q Will you understand that "CSB," when we  
22 use it in today's deposition, means Community  
23 Service Board?

24 A Yes.

25 Q And finally, will you understand any

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1 reference to "CDC" as indicating the Center for  
2 Disease Control and Prevention?

3 A Yes.

4 Q So I'd like to now pivot to our next  
5 document.

6 MR. HOLKINS: I'm publishing Exhibit 334.

7 (WHEREUPON, Plaintiff's Exhibit-334 was  
8 marked for identification.)

9 MR. HOLKINS: For the record, this  
10 document is stamped GA02771743.

11 BY MR. HOLKINS:

12 Q It appears from the cover to be an email  
13 from you to Rebecca Blanton and others, dated  
14 December 18, 2018, and it includes a number of  
15 attachments. The subject is "Project AWARE Grant  
16 Sections."

17 I'm introducing this primarily to talk  
18 about one of the attachments, but if you would like  
19 to take a look at your email, you're more than  
20 welcome to.

21 I'll give you control.

22 A Thanks.

23 (Witness reviews exhibit.)

24 A Okay.

25 Q Thank you. So let me just ask, what is

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1 Project AWARE?

2 A So Project AWARE has been -- I believe  
3 it's typically a SAMHSA funded grant -- sorry.  
4 Thank you.

5 Project AWARE is I believe typically a  
6 SAMHSA funded grant that has been granted -- I know  
7 that the Department of Education received it one  
8 time. I believe they may have received it a second  
9 time as well. To really build up socioemotional  
10 health and provide trainings and services within the  
11 schools. And so -- yes.

12 Q When you refer to the Department of  
13 Education, was that the Georgia Department of  
14 Education?

15 A Yes.

16 Q Sorry. Go ahead.

17 A I was just going to say that in our case  
18 that's Georgia Department of Education, but Project  
19 AWARE is something that folks nationally can apply  
20 to.

21 Q And if I understand your testimony  
22 correctly, you know of at least one time when the  
23 Georgia Department of Education has received funds  
24 through the Project AWARE --

25 A Yes.

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1 Q -- grant?

2 A Yes.

3 Q When was that?

4 A I don't know the exact years. It was  
5 several years ago, and I believe that they submitted  
6 a reapplication. I believe they received it but I'm  
7 not sure. And we are not involved.

8 Q Can you describe what's happening in this  
9 email here dated December 18, 2018? What are you  
10 emailing about?

11 A Yes. So I am emailing with Rebecca  
12 Blanton because they asked us at that time for their  
13 Project AWARE application to be their evaluation  
14 consultant.

15 So as they were preparing their  
16 application, we put together an evaluation plan with  
17 all of the necessary materials for that for their  
18 grant application. That application was not funded.

19 Q What does it mean to be an evaluation  
20 consultant?

21 A It means that we provide our, our  
22 expertise in research and evaluation in terms of  
23 looking at programs and working with partners to  
24 identify what are the best questions to ask in terms  
25 of how well programs are working, and then we work

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1 with them to collect the data to be able to answer  
2 those questions.

3 Q Have you served -- excuse me.

4 Has the Center of Excellence at the  
5 Georgia State University served as evaluation  
6 consultant in connection with any other grants  
7 received by the Georgia Department of Education?

8 MR. BEDARD: Object to form.

9 You can go ahead.

10 A No, not with the Department of Education.

11 Q With any other state agency?

12 A Yes.

13 Q Which one?

14 A Georgia Department of Behavioral Health  
15 and Developmental Disabilities.

16 Q In connection with which grant?

17 A Multiple.

18 Q What's the most recent?

19 A The most recent is one that is a SAMHSA  
20 funded grant, System of Care, AIME, that is working  
21 within several different communities within the  
22 State delivering services, and we provide evaluation  
23 around those services that's not related to the  
24 schools.

25 Q What services are provided through this

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1 AIME grant?

2 A Great question, because I'm not integrally  
3 involved in the day to day. I mean they're  
4 behavioral health services. They're working with a  
5 couple of the provider agencies in terms of  
6 providing trainings and looking at how those  
7 services are impacting their communities.

8 Q Are those services funded through the AIME  
9 grant provided in school settings?

10 A No, not to my knowledge.

11 Q Who is point person for that evaluation  
12 project within the Center of Excellence?

13 A So I am kind of providing the overall  
14 oversight. Russell Carleton is involved in leading  
15 the evaluation.

16 Q What are the other grants for DBHDD where  
17 the Center of Excellence has served as an evaluation  
18 partner?

19 A There are a lot.

20 Q Just to narrow the scope, within the last  
21 -- from 2020 forward, what are the other grants  
22 where the Center of Excellence has served as  
23 evaluation partner for DBHDD?

24 A We are working with the Department of  
25 Behavioral Health Developmental Disabilities, as



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1 well as several other groups, community  
2 organizations within the State, for a HSRA grant,  
3 where we are building capacity within pediatrician's  
4 offices around behavioral health, and we have an  
5 evaluation component there.

6 Through our state funding with DBHDD, we  
7 provide evaluation services for the Georgia Apex  
8 Program.

9 We provide evaluation services for the  
10 wraparound services and the IC3 program.

11 I'm trying to think of the other  
12 evaluation services.

13 We work with the State on recovery  
14 oriented cognitive therapy, but that's with adults,  
15 not children. And we evaluate the trainings  
16 provided.

17 Q Do you provide any evaluation services in  
18 connection with Crisis Stabilization Units in  
19 Georgia?

20 A Not me personally. Our staff does do some  
21 monitoring and evaluation of some of those units and  
22 providing kind of ongoing feedback.

23 Q And what about the Clubhouse?

24 A Yes.

25 Q Is that another example?

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1 A Yes, that's a great example.

2 Q Where your staff -- I should say staff at  
3 the Center of Excellence, are providing evaluation  
4 in connection with implementation of the Clubhouses  
5 in Georgia?

6 A Yes.

7 Q When we use the acronym "SAMHSA," I want  
8 to clarify for the record that means Substance Abuse  
9 and Mental Health Services Administration, correct?

10 A Yes.

11 Q So I would like to pull up one of the  
12 attachments to this email, which is your  
13 biographical sketch, dated December 2018.

14 Give me one second and I'll pull that up  
15 to the screen.

16 MR. HOLKINS: I've just published what  
17 we're marking at Exhibit 335 for the record.

18 (WHEREUPON, Plaintiff's Exhibit-335 was  
19 marked for identification.)

20 MR. HOLKINS: This document is stamped on  
21 the first page GA02771758.

22 BY MR. HOLKINS:

23 Q Ma'am, what is this document?

24 A So that is my biographical sketch, which  
25 we often need to put in with grant applications,

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1 particularly federal grant applications, that list  
2 out my background and experience.

3 Q So I'm going to give you control of the  
4 document, and I'll give you an opportunity to review  
5 it. The question I'm going to ask you after you've  
6 reviewed it is whether it's accurate, whether you  
7 have any updates.

8 So let me just give you control now. You  
9 should be able to click on the document.

10 (Witness reviews exhibit.)

11 A I don't know that I have necessarily any  
12 updates. Each bio sketch -- there's part of it that  
13 is specific to the grant application. But I think  
14 the information in here is accurate.

15 Q Thank you.

16 A Yes.

17 Q Let's talk a little bit about your  
18 educational background. You have a Ph.D., correct?

19 A Yes.

20 Q From where?

21 A A Ph.D. from Indiana University.

22 Q What was the Ph.D. in?

23 A Clinical psychology.

24 Q Did you have a -- did you complete a  
25 dissertation as part of that Ph.D.?

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1 A Yes.

2 Q What was the subject of the dissertation?

3 A That was a long time ago.

4 It was adherence to treatment among  
5 adolescents with cystic fibrosis, and also looking  
6 at the different stressors and coping mechanisms  
7 that adolescents with cystic fibrosis may use.

8 Q Do you maintain any current licensures?

9 A Yes.

10 Q What are they?

11 A I'm licensed as a clinical psychologist  
12 here in Georgia.

13 Q Are you practicing?

14 A No.

15 Q Do you have experience -- excuse me.

16 Do you have experience implementing  
17 clinical trials?

18 A Yes.

19 Q Could you describe the most recent  
20 clinical trial that you have experience  
21 implementing?

22 A Yes. It's been a while, and it was not a  
23 clinical trial in terms of a drug trial. It was a  
24 clinical randomized control trial with a nutritional  
25 intervention with school-aged children in Guatemala.

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1 Looking at whether zinc may --

2 THE WITNESS: Can you hear me? Speak  
3 louder still?

4 A Whether zinc, providing zinc  
5 supplementation for children in school-age years may  
6 help to alleviate some of their mental health  
7 symptoms.

8 Q When was this study conducted?

9 A It was probably around 2003 or 2004 to  
10 2008, when I was at Emory.

11 Q And since then do you have any experience  
12 leading or implementing randomized clinical studies?

13 A No.

14 Q And that includes from your work with the  
15 Center of Excellence, correct?

16 A Yes. Our work, because of the type of  
17 work we do, we don't do randomized control trials.

18 Q Can you explain why?

19 A Sure. When we are working with partners  
20 and programs that are out in the field, it's really  
21 not possible to randomize. So we will look for  
22 other ways to evaluate and to look at things.

23 MR. HOLKINS: One second.

24 A Sure.

25 Q Is it correct Dimple Desai is no longer

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1 employed by the Georgia University Center of  
2 Excellence?

3 A Yes.

4 Q Are you aware of the circumstances  
5 surrounding her departure from that role?

6 A Yes.

7 Q Why did she leave that job?

8 MR. BEDARD: Object to form.

9 THE WITNESS: Does that mean I can answer?

10 MR. BEDARD: Any time I object, you can  
11 answer unless I instruct you not to answer.

12 A Yes. In conversations with her, she was  
13 ready for a new chapter and a new adventure, and so  
14 we support her on that.

15 She is continuing to work with us as a  
16 part-time employee on a few things just for a short  
17 time.

18 Q In this transition period, what is Ms.  
19 Desai assisting the Center of Excellence with?

20 A Sure. We are working on helping to  
21 develop some briefs with the Carter Center around  
22 what best practices are for universal prevention for  
23 school-based behavioral health. So we are going to  
24 pull on her expertise to help with that.

25 Q Is that work funded by the Carter Center?

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1 A Not yet, but, yes, it will be. I don't  
2 know where their funding comes from.

3 Q So I'd like to set aside this document for  
4 now.

5 What is your current title at the Georgia  
6 State University Center of Excellence?

7 A I'm the director of behavioral health at  
8 the Georgia Health Policy Center.

9 I'm the director of the Center of  
10 Excellence for Children's Behavioral Health.

11 And I am a research associate professor in  
12 the School of Social Work.

13 Q So I want to break that down.

14 A Sure.

15 Q Because I understand those are two  
16 different roles.

17 Could you describe briefly what your  
18 duties are as director of behavioral health at the  
19 Georgia Health Policy Center?

20 A Yes. I am part of the executive team for  
21 the Georgia Health Policy Center. So we have a CEO  
22 and then there are four of us who are content  
23 directors and a few others, director over admin,  
24 director over marketing.

25 So my role is just to help oversee the

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1 behavioral health work that happens in the Center  
2 from a balcony view, look for additional  
3 opportunities.

4 My role is also heavy involvement in the  
5 running and the management of the Center in  
6 collaboration with my colleagues on the executive  
7 team.

8 Q Do you have staff directly reporting to  
9 you in your capacity as behavioral health director  
10 at GHPC?

11 A Yes.

12 Q How many?

13 A Five or six.

14 Q So let's shift now to the COE role. As  
15 director of the Center of Excellence, what are your  
16 duties?

17 A There is some overlap with the overall  
18 director of behavioral health role, but my specific  
19 role is to oversee the Center of Excellence for  
20 behavioral health team, which is about 30 to 35  
21 staff, mainly full-time, a few part-time. To work  
22 with -- I also have a leadership team, and they are  
23 overseeing different portfolios and areas of work.  
24 So to work with them as they also work with staff.

25 To develop work, to carry out our work, to



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1 network, to continue to make sure that folks are  
2 aware that we can support partner agencies around  
3 research, evaluation, training, and policy analysis.

4 Q And just to complete the trilogy, what  
5 does your work entail as a research associate  
6 professor?

7 A So that is -- a research faculty on the  
8 School of Social Work. So I partner with some of  
9 the faculty there on research projects, on  
10 manuscripts, and support -- go to faculty meetings  
11 and support as I can.

12 Q In your capacity at the Health Policy  
13 Center and COE is it part of your job to seek out  
14 funding opportunities?

15 A Yes.

16 Q Including federal grants?

17 A Yes.

18 Q And in your capacity at the Center of  
19 Excellence and at the Health Policy Center, do you  
20 work directly with staff at DBHDD?

21 A Yes.

22 Q Who are your primary counterparts at  
23 DBHDD?

24 A We work very directly with Dante McKay,  
25 who is the director of the Office of Children, Young

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1 Adults and Families.

2 We work occasionally with Monica Johnson,  
3 who is the division director.

4 We work with Layla Fitzgerald as part of  
5 Apex.

6 We work with -- there are lot of people we  
7 work with. We work with Nyka Greene over some of  
8 the prevention work, Cristal Davidson around  
9 substance use work.

10 We were working on the adult side with  
11 Terry Timberlake, and there is a new director.  
12 She's no longer there and we just met her and I'm  
13 blanking on her name.

14 Q On the children and adolescent side, how  
15 regularly do you -- are you in contact with Dante  
16 McKay?

17 A We attend a lot of the same meetings. I  
18 would say we have touched bases probably quarterly.

19 Q What's a touch base?

20 A It is to just have a meeting with him,  
21 talk about the deliverables in our contract, see if  
22 there are areas that we need to think about, what's  
23 going well, where there may be some challenges.

24 We -- yeah.

25 Q Are these solo meetings, just you and

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1 Dante McKay?

2 A Sometimes it's just me and Dante.  
3 Sometimes it is myself along with Renee Johnson, who  
4 is on my staff, and the director of the System of  
5 Care and oversees the IDT. Sometimes it is with  
6 myself and Astrid Prudent, who is on my leadership  
7 team, who is helping to oversee the mechanics of our  
8 contract with him.

9 And then occasionally it's with our larger  
10 leadership team as we're thinking about the next  
11 year's deliverables.

12 Q When you reference contract, you're  
13 talking about the contract between the Georgia State  
14 University Center of Excellence and DBHDD that  
15 defines the scope of work that the Center of  
16 Excellence will be performing in that fiscal year --

17 A Yes.

18 Q -- is that accurate?

19 A Yes. Yes, that's accurate.

20 Q Give me one second. I'm going to show  
21 another document.

22 A Sure.

23 Q There are few steps. I have to disclose  
24 this to counsel, so just give me a minute.

25 MR. HOLKINS: So I've just published what

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1 we're marking as Exhibit 335 -- one second.

2 So this will be Exhibit 336.

3 (WHEREUPON, Plaintiff's Exhibit-336 was  
4 marked for identification.)

5 BY MR. HOLKINS:

6 Q It's an email. From its cover it appears  
7 to be an email from you dated November 17, 2021.

8 MR. HOLKINS: I'll note for the record at  
9 the bottom of the email -- the first page of  
10 this document we see the stamp GA03967230.

11 BY MR. HOLKINS:

12 Q Ma'am, what are you sending with this  
13 email?

14 A So with this email I am forwarding -- we  
15 are also working with DBHDD on -- it is an  
16 adaptation of wraparound. It's moderate care  
17 customized coordination.

18 Russell and Susan are really over this  
19 contract. It came to me, so I am forwarding to them  
20 so that they can review, make sure that the scope of  
21 work, the budget match with what they have discussed  
22 with our folks at DBHDD, so that we can then process  
23 it through the University.

24 Q So who authored the contract that you're  
25 attaching here?

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1 MR. BEDARD: Object to form.

2 A DBHDD.

3 Q They sent it to you, and then you in turn  
4 are forwarding it to Susan and Russell?

5 A To review, yes.

6 Q Is also that the process for the  
7 overarching scope of work contract between COE and  
8 DBHDD?

9 A You mean the large OCYF contract?

10 Q Correct.

11 A No. Myself and Astrid are the ones who  
12 really are more intimately -- know more about that  
13 contract. So we would be the one to be -- we put  
14 together the proposal each year. We review, make  
15 sure the scope of work and things are correct.

16 Q Give me a second. I'm going to show you  
17 the attachment.

18 A Sure.

19 MR. HOLKINS: So I've just published what  
20 we're marking as Exhibit 337.

21 (WHEREUPON, Plaintiff's Exhibit-337 was  
22 marked for identification.)

23 MR. HOLKINS: For the record, the stamp on  
24 the first page is GA03967232.

25

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1 BY MR. HOLKINS:

2 Q Ma'am, is this the contract that you  
3 attached to the email we just discussed?

4 And feel free to take a look. I can give  
5 you control.

6 A I don't have memorized the amount, and so  
7 because we have multiple contracts, let me see.

8 (Witness reviews exhibit.)

9 A I'm looking for the scope of work.

10 Q Take your time.

11 A Okay. Yes.

12 Q I want to direct you to Page 2 of this  
13 contract, under the section titled "Mailing  
14 Addresses," No. 2.

15 A Yes.

16 Q You are identified as the point of contact  
17 for the Georgia State University Center of  
18 Excellence, correct?

19 A Yes. I often receive the contracts  
20 because I'm the director, and we also have certain  
21 people who can PI.

22 So I often get them, but the program  
23 director and the folks overseeing it are the ones  
24 who then are carrying out a lot of that.

25 Q Do you sign -- did you sign this contract?

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1           A       No, I don't sign. It has to be signed by  
2 the officials at the University.

3           Q       Do you -- are you also identified as the  
4 point of contact on the OCYF contract that we  
5 discussed earlier?

6           A       Yes. Yes.

7           Q       Could you describe how moderate customized  
8 care coordination is different from intensive  
9 customized care coordination?

10          A       I'm not sure because I'm not involved in  
11 the nitty-gritty of the work.

12                   Intensive care coordination really is  
13 focused on those youth with more serious  
14 difficulties in terms of those wraparound services.

15                   I think that modern care -- customized  
16 care coordination is supposed to be a slightly --  
17 diminished isn't the right word but it's a softer  
18 version of that, for youth who may not have as many  
19 of the serious concerns.

20          Q       Do you know how many providers of the MC3  
21 service there are in Georgia currently?

22          A       No. I know for IC3, and I'm assuming that  
23 MC3 will also work with them, but a lot of that  
24 program is still in development.

25          Q       Just to make sure I understand your

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1 testimony, is it your expectation that the same care  
2 management entities that are providing the IC3  
3 service will also offer the MC3 service?

4 A I think so, but I'm not sure.

5 Q At present, are you aware of any children  
6 actually being enrolled in the MC3 service in  
7 Georgia?

8 A No.

9 Q They aren't, or are you not aware?

10 A I'm not aware.

11 Q Was the development of the MC3 service an  
12 idea proposed by DBHDD, or the Center of Excellence?

13 A It was an idea, to my knowledge, proposed  
14 by DBHDD.

15 Q Setting aside this document, as part of  
16 your duties at the Center of Excellence or the  
17 Health Policy Center, do you communicate with  
18 Commissioner Judy Fitzgerald?

19 A Occasionally.

20 Q About what?

21 A I know that I have attended the Behavioral  
22 Health Coordinating Council meeting once or twice  
23 before Renee Johnson came on board. That would not  
24 be one-on-one communication. That would be hearing  
25 as she presents.



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1 I have communicated with her at some of  
2 the events that have happened, the Children's Mental  
3 Health Day that happens in May.

4 We were part of a meeting also with our  
5 dean in terms of potential collaborations, but I  
6 haven't had a whole lot of one-on-one with her.

7 Q Do you coordinate directly with any staff  
8 at the Department of Community Health in your  
9 capacity at COE?

10 A No, not at this time.

11 Q Previously?

12 A Yes, when there were folks there that  
13 we've worked with, but I'm not our main DCH contact.

14 Q Who is the main DCH contact at the Center  
15 of Excellence?

16 A Angie Snyder.

17 Q How long has she been the main DCH contact  
18 at the Center of Excellence?

19 A Oh, for -- even before I got there, and  
20 I've been there almost nine years.

21 Q Did you coordinate at all with Frank Berry  
22 when he was leading the Department of Community  
23 Health?

24 A No, not personally.

25 Q Do you coordinate directly with any staff

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1 at the Georgia Department of Education in your  
2 capacity at the Center of Excellence?

3 A Yes. We were -- having a lot of  
4 interaction with Rebecca Blanton because she was the  
5 co-chair for the Interagency Directors Team several  
6 years ago. Our communication has been much less.

7 We have worked somewhat with Ashley  
8 Harris, and Garry McGiboney when he was at the  
9 Department of Education.

10 Q And what do you work with Ms. Harris on  
11 when you to work with her?

12 A We have just had some -- do you need me to  
13 pause?

14 Q Please go ahead.

15 A We've had conversations with her about how  
16 we can be helpful in coordinating and addressing  
17 school-based mental health services. Because of our  
18 work with DBHDD and the Georgia Apex Program,  
19 thinking broadly as well about school-based -- or  
20 mental health services within the schools and  
21 whether there are opportunities.

22 We had communicated at one point about  
23 pursuing a grant opportunity. That didn't happen.

24 Q Do you ever communicate with Ms. Harris or  
25 any staff at the Georgia Department of Education

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1 about the GNETS program?

2 A No.

3 Q Is that true since you joined the Center  
4 of Excellence nine years ago?

5 A Yes.

6 Q Are you aware of the pilot program at  
7 South Metro GNETS to implement high-fidelity  
8 wraparound?

9 A Yes. I know that we were engaged by  
10 them -- it was a few years ago -- to do some  
11 training around wraparound services.

12 Astrid Prudent has been involved in that,  
13 and I believe that we were also engaged to do some  
14 evaluation of that training and those services. I  
15 don't know where that landed.

16 Q Did you have any involvement in the  
17 evaluation process for that pilot?

18 A Me personally, no.

19 Q Other than the individuals you listed,  
20 Ashley Harris, Rebecca Blanton, Garry McGiboney, do  
21 you coordinate with anyone at the Department of  
22 Education?

23 A I can't think of anyone else.

24 Cheryl Blan -- Cheryl, Cheryl Benefield.  
25 But it's been a while.

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1 Q Do you have a standing meeting with any  
2 staff at the Department of Education?

3 A No, I don't. My staff have a regular  
4 meeting with DBHDD around the Georgia Apex Program.  
5 And the Department of Education, some of those staff  
6 have attended. I don't know how regularly they are  
7 attending.

8 Q You referenced a grant opportunity that  
9 you discussed with Ashley Harris. Is that correct?

10 A That was with Rebecca Blanton -- oh, I  
11 see.

12 Yes, it was -- I don't remember where the  
13 funding opportunity came from. It may have been  
14 SAMHSA, but it was to kind of expand school-based  
15 mental health services across the State.

16 Q I'd like to show you a couple of  
17 documents. If you just give me a minute, I'll pull  
18 them together.

19 A Sure.

20 Is it appropriate to give a point of  
21 clarification on something we just talked about?

22 Q Absolutely. Please go for it.

23 A So when you asked about the evaluation of  
24 the South Metro, I am listed as the PI on that, but  
25 I have not been integrally involved on that.

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1 Q PI means principal investigator?

2 A Kind of overseeing, yeah, kind of the  
3 initial proposals and those types of pieces. So  
4 point of contact. But it's Astrid and I believe  
5 Susan who have been more involved.

6 Q Susan McLaren?

7 A Uh-hum. (Affirmative.)

8 MR. HOLKINS: I'm publishing what we're  
9 marking as Exhibit 338.

10 (WHEREUPON, Plaintiff's Exhibit-338 was  
11 marked for identification.)

12 MR. HOLKINS: For the record, this  
13 document is Bates-stamped on the first page  
14 GA00572261.

15 BY MR. HOLKINS:

16 Q And this is an email thread that includes  
17 both yourself and Ashley Harris and a number of  
18 other individuals, including Garry McGiboney and  
19 Cheryl Benefield.

20 I'll give you an opportunity to  
21 familiarize yourself with the full chain. Give me a  
22 second and I will give you control.

23 You have control of the document. Please  
24 let me know when you're reviewing it.

25 A And that was in reference to what I was

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1 just talking about, the opportunity that we reach  
2 out to them about.

3 Q Thank you.

4 (Witness reviews exhibit.)

5 A Okay.

6 Q Thank you. So let me just note that this  
7 email thread starts in May, May 29, 2020. It's the  
8 first email, and the last one is June 12, 2020.

9 I want to start at the bottom.

10 You received an email from Lisa McGarrie.  
11 Who is that?

12 A So Lisa McGarrie was on staff with us.  
13 She was part of our leadership team, and she was  
14 leading the policy and finance work. And so as part  
15 of that work, when any of us come across  
16 opportunities that we think might be helpful, we  
17 pass them on, which is what she did.

18 She is no longer working with us.

19 Q Ms. McGarrie writes in her email: "State  
20 education agency must be the lead"?

21 A Yes.

22 Q What's your understanding of that?

23 A That means that we as the Center of  
24 Excellence and as a University could not be the  
25 prime or the lead in applying for this grant. So it

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1 would need to be the state education agency that  
2 applies.

3 So we were reaching out to see if there  
4 was interest from our state education agency to  
5 apply, and we could support with proposal writing as  
6 well as the evaluation, and the response from Ashley  
7 after discussing with her group was that they  
8 weren't ready to apply at that time.

9 MR. HOLKINS: Just one second, please.

10 A Sure.

11 Q Before we get too far ahead of ourselves,  
12 what was Ms. McGarrie's title when she worked in the  
13 Center of Excellence? Do you remember?

14 A She started out as a Senior Research  
15 Associate, and then moved into an assistant project  
16 director position, and she was the lead for policy  
17 and -- policy and finance within the Center of  
18 Excellence for Children's Behavioral Health.

19 Does that not --

20 Q That's fine. So the policy and finance is  
21 a component within the Center of Excellence,  
22 correct?

23 A Yes. Sorry.

24 So with her GSU title, what started out as  
25 senior research associate, she moved to assistant

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1 project director.

2           Within our team we developed designated  
3 leads. So there are two folks leading the workforce  
4 development training capacity building, two folks  
5 leading research and evaluation, and then Lisa was  
6 leading the overall -- it's really more the policy  
7 work, and she was also leading work on infant and  
8 early childhood mental health.

9           Q     Did she have any responsibilities over  
10 project development in her role?

11          A     Yes.

12          Q     Could you describe what those were?

13          A     We all have those responsibilities of  
14 looking for potential opportunities, funding  
15 opportunities, if they're federal, and they are  
16 relevant to us. If we can apply -- if they involve  
17 partners, reaching out to partners. Also sharing,  
18 there may be opportunities that those in the  
19 community are well-positioned for, you know, sharing  
20 those opportunities.

21                So we are all in that because we're a soft  
22 money shop.

23          Q     A soft money shop?

24          A     Sorry. Yes.

25          Q     Could you explain that?



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1 A We are most fully grant funded.

2 Q What would a hard money shop be?

3 A That would be -- you might be in a  
4 university setting where you have a faculty position  
5 where there is hard money that comes from whatever  
6 sources, and you have a guaranteed salary, a  
7 guaranteed -- yes.

8 Q Like a line item in a budget?

9 A Could be.

10 Q Okay. Is it -- I want to go back to this  
11 first email from Ms. McGarrie where she says "state  
12 education agency must be the lead."

13 Is it common for federal grants to require  
14 state agency -- or a state agency be the primary  
15 applicant?

16 A Yes. I don't know if it would be common  
17 but it does -- yes, it does happen.

18 Q In your email dated May 29, 2020 you write  
19 to Garry McGiboney, Rebecca Blanton, Cheryl  
20 Benefield, and Ashley Harris, in part: "We wanted  
21 to make sure you are aware of the below grant  
22 opportunity for building school-based mental health  
23 services."

24 Do you recall the specifics of how this  
25 grant would build school-based mental health

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1 services?

2 A I think the specifics were primarily up to  
3 those who were writing the proposals. And so I  
4 don't recall the exact criteria in terms of what --  
5 again, I believe this was from SAMHSA. I'm not  
6 positive, but, you know, that would be part of the  
7 evaluation of the proposal, is what the mechanisms  
8 are, what the services are that are put into that  
9 proposal.

10 Q If you scroll down to the very bottom of  
11 the document.

12 A I see it. It's from the department -- the  
13 Department of Education.

14 Q That was the source of the grant?

15 A Okay.

16 Q Is that accurate?

17 A I believe so, based on this.

18 Q So it seems like based on your  
19 recollection that there was some flexibility in  
20 designing a proposal to receive this funding to  
21 build school-based mental health services, correct?

22 A Yes. If I'm recalling correctly, the  
23 purpose was to expand school-based mental health  
24 services throughout the state.

25 Q Skipping ahead in the chain -- or moving

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1 up in the chain, on May 29, 2020, Ms. Harris writes  
2 back, in part: "I want to include both Dante McKay  
3 and Layla Fitzgerald on this communication as we are  
4 working on several projects to establish higher  
5 collaboration."

6 Moving forward to Ms. Harris' email dated  
7 June 12, 2020, this is the email, correct, where she  
8 informs you the Department of Education will not be  
9 moving forward with the grant?

10 A Correct.

11 Q And based on her email, what's your  
12 understanding of why the Department of Education  
13 chose not to move forward with this grant?

14 MR. BEDARD: Object to form.

15 A From the email and from what I recollect,  
16 they were at a point where they wanted to do some  
17 more kind of internal mapping of what's available,  
18 where the need is, and really get themselves more  
19 ready to apply for some of these types of grants.

20 Q Do you have any knowledge about that  
21 internal mapping project within the Georgia  
22 Department of Education?

23 A No.

24 Q Have you received any updates from Ms.  
25 Harris or other staff at the Georgia Department of

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1 Education about that mapping project?

2 A No.

3 Q Do you know whether the Georgia Department  
4 of Education has in fact undertaken any  
5 comprehensive internal inventory, as described in  
6 this email?

7 A I would assume, but I do not know for  
8 sure. I have not seen anything.

9 I, I know that they are having a lot of  
10 conversations and that there is a lot of work that's  
11 happening there around school-based mental health,  
12 but I don't know anything about the specifics.

13 Q Since this email exchange in June of 2020,  
14 has the Center of Excellence partnered with the  
15 Georgia Department of Education on any grants to  
16 expand school-based mental health services?

17 A No.

18 Q Since this email, have you brought to the  
19 attention of staff at the Georgia Department of  
20 Education any grant opportunities to expand  
21 school-based mental health services?

22 A I don't think so.

23 Q Do you know if any of your staff have done  
24 that?

25 A I don't think so.

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1 Q I'm going to set this document aside.

2 So we're going to take a break shortly but  
3 I would like to quickly introduce a number of  
4 exhibits, have you describe what they are. It  
5 shouldn't take long.

6 Just give me one second and I'll pull them  
7 all up.

8 A Sure.

9 MR. HOLKINS: Counsel, I just sent the  
10 email that I will be introducing along with all  
11 of the attachments.

12 MR. BEDARD: Thank you.

13 I've just published what we're marking as  
14 Exhibit 339.

15 (WHEREUPON, Plaintiff's Exhibit-339 was  
16 marked for identification.)

17 MR. HOLKINS: For the record, this  
18 document is stamped GA00654336.

19 BY MR. HOLKINS:

20 Q From its cover it appears to be an email  
21 from you dated December 2nd, 2019, to Dante McKay,  
22 with the subject "Forward: Sending brief outlines  
23 to DBHDD."

24 I'll give you control of the document so  
25 you can review it. Please let me know when you're

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1 finished.

2 (Witness reviews exhibit.)

3 A I'm finished.

4 Q I want to acknowledge that there is an  
5 email below yours dated December 2, 2019, from Ani  
6 Scott Whitmore. Who is Ani Scott Whitmore?

7 A So Ani Scott Whitmore was also on our  
8 team. She recently has also left and is doing more  
9 independent consulting.

10 She has had multiple roles. She was my  
11 supervisee. She did work on the Georgia Apex  
12 Program and was the evaluation lead at the time.

13 That's who that is. And she was a senior  
14 research associate.

15 Q And you mentioned that Ms. Whitmore has  
16 since left the Center of Excellence, correct?

17 A Yes. Just recently.

18 Q What was the purpose of your email to  
19 Dante McKay?

20 A So as the director of the center, we try  
21 to consolidate a lot of the correspondence that  
22 happens. And so my purpose was to send to him -- I  
23 don't remember the specifics of the briefs around  
24 Apex because we've done multiple, but to send him  
25 for his feedback some proposed outlines for these

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1 topical briefs around Apex, and then upon his  
2 feedback we would incorporate that.

3 Q Did Dante McKay ask the Center of  
4 Excellence to submit these potential topic briefs?

5 A Did he ask us to do those briefs? Yes --  
6 or --

7 Q I guess my question is, are you providing  
8 these documents in response to a request by Dante  
9 McKay?

10 A Yes. So that was part of our scope of  
11 work with them around Apex, was to develop certain  
12 briefs to try to disseminate information about the  
13 program.

14 Q And did your staff choose the topics that  
15 are covered in these briefs, or were those requested  
16 by Dante McKay?

17 A I believe that the topics were decided and  
18 discussed in partnership. And so they had some  
19 ideas, and then we may also have put some of our  
20 suggestions and input in.

21 Q And did all of these proposed briefs  
22 ultimately get drafted?

23 A I believe so. I know we've had, I would  
24 say, four to five Apex briefs. I don't know again  
25 specifically which ones this email is referring to.

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1 Q When the Center of Excellence does a --  
2 completes an issued brief for OCYF staff about Apex,  
3 are those circulated publicly or just to DBHDD  
4 staff?

5 A If we receive approval from DBHDD, from  
6 Dante McKay, that this is final and it's okay for  
7 public dissemination, then, yes, we post it on our  
8 website and we're free to disseminate widely.

9 Q Has Dante McKay or any other staff at OCYF  
10 ever requested the Center of Excellence draft an  
11 issue brief on GNETS programs?

12 A No.

13 Q And to be clear, that would include issue  
14 briefs about the adequacy of behavioral health  
15 services interventions offered through the GNETS  
16 programs?

17 A To my knowledge, we've not been requested  
18 to do any type of issue brief related specifically  
19 to GNETS.

20 Q So I would like to just run through these  
21 attachments and introduce them as exhibits, and then  
22 we'll take a break.

23 A Sure.

24 MR. HOLKINS: I've just published what  
25 we're introducing as Exhibit 340.



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1 (WHEREUPON, Plaintiff's Exhibit-340 was  
2 marked for identification.)

3 MR. HOLKINS: For the record, this  
4 document is stamped GA00654337. The title is  
5 "The Georgia Apex Program: Rural Workforce."

6 BY MR. HOLKINS:

7 Q Ma'am, do you know whether this proposal  
8 resulted in a published brief?

9 A Yes.

10 MR. BEDARD: Object to form.

11 A Yes, it did.

12 Q So this --

13 A I believe so.

14 Q So the end point of this document is  
15 publicly available, correct?

16 A I believe so.

17 Q Did you have any role in developing the  
18 issue brief relating to rural workforce in Apex?

19 A No.

20 Q Who drafted that?

21 A That is a great question. I, I am not  
22 positive. I'm sure that Dimple was involved as the  
23 lead for school-based mental health in Apex. I  
24 believe that Lisa McGarrie has been involved in some  
25 of the writings of briefs as well, and she has some

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1 rural health experience.

2 I'm not positive who offered this brief.

3 MR. HOLKINS: I've just published what  
4 we're marking as Exhibit 341.

5 (WHEREUPON, Plaintiff's Exhibit-341 was  
6 marked for identification.)

7 MR. HOLKINS: This document is stamped  
8 GA00654338.

9 The title is "Georgia Apex Program: Best  
10 Practices for Assessing Implementation  
11 Readiness."

12 BY MR. HOLKINS:

13 Q Ma'am, what is your understanding of the  
14 term "implementation readiness"?

15 A This term is about whether or not schools  
16 are ready to partner with Apex providers and have  
17 specific criteria in terms of being ready to  
18 implement things effectively.

19 I can't tell you exactly what those things  
20 are, but yes.

21 Q Did OCYF staff approve for publication by  
22 the COE a final issue brief related to best  
23 practices for implementation of readiness?

24 MR. BEDARD: Object to form.

25 A I believe so, yes.

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1 Q Who drafted that brief for the COE?

2 A I believe that Dimple was leading on this.  
3 I am not positive.

4 MR. HOLKINS: I've just published what  
5 we're marking as Exhibit 342.

6 (WHEREUPON, Plaintiff's Exhibit-342 was  
7 marked for identification.)

8 MR. HOLKINS: This document is marked  
9 GA00654339. The title is "The Georgia Apex  
10 Program + School Climate."

11 BY MR. HOLKINS:

12 Q Ma'am, what is your understanding of the  
13 term "school climate"?

14 A So school climate is -- and we've done  
15 quite a bit of work on this, but school climate is  
16 the environment within the school setting. It  
17 includes attendance, school attendance. It includes  
18 school disciplinary incidents. It includes kind of  
19 safe and positive learning environment.

20 And so there is a lot of work around what  
21 can influence positive school climate and there's a  
22 lot of research out there around the importance of  
23 school climate for youth and children's behavioral  
24 health as well.

25 Q I believe you assisted in drafting an

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1 article --

2 A Yes.

3 Q -- on this subject, correct?

4 A Yes.

5 Q We'll talk about that in a bit, but just  
6 to stick with this issue brief, did DBHDD approve  
7 for publication by the Center of Excellence an issue  
8 brief concerning the Georgia Apex Program and school  
9 climate?

10 A I am not sure about this one. I have been  
11 much more involved in the writings, the academic  
12 papers and manuscripts, which they partnered with us  
13 and approved.

14 I do not remember seeing this brief, as I  
15 kind of have gone through for something else,  
16 looking at the briefs that we have. So I'm not sure  
17 on this one.

18 Q We'll actually stop there.

19 Let me first ask before we take a break,  
20 has the Center of Excellence developed any other  
21 issue briefs at the request of OCYF staff relating  
22 to the Apex program since 2020?

23 A There were several briefs, and I can't  
24 remember all the different, but, yes, I think we've  
25 done at least three to four issue briefs, and they

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1 would be posted on our website.

2 Q Has the Center of Excellence, since you  
3 joined nine years ago, drafted any issue briefs for  
4 the Georgia Department of Education?

5 A No. I think in addition to some of the  
6 briefs we've talked about for Apex, there are also  
7 issue briefs that summarize the evaluation results  
8 per year. And so those are also made publicly  
9 available on our website, for Apex specifically.

10 Q If the Department of Behavioral Health and  
11 Developmental Disabilities requested of the Center  
12 of Excellence that they draft an issue brief  
13 relating to the GNETS program, is that something  
14 that the Center of Excellence would have the  
15 capacity to do?

16 A I think so.

17 Q To be clear, that request has never been  
18 made to you?

19 A No. Not to my knowledge.

20 MR. HOLKINS: Let's go ahead and take our  
21 break, and we can do 15 minutes.

22 MR. BEDARD: Okay.

23 THE VIDEOGRAPHER: Off the record at 4:31  
24 p.m.

25 (A recess was taken.)

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1 THE VIDEOGRAPHER: Back on the record at  
2 4:46 p.m.

3 BY MR. HOLKINS:

4 Q Welcome back.

5 A Thank you.

6 Q So I'd like to jump right into another  
7 document. Give me a second and I will pull it up.

8 MR. HOLKINS: I'm publishing what we're  
9 marking as Exhibit 343.

10 (WHEREUPON, Plaintiff's Exhibit-343 was  
11 marked for identification.)

12 MR. HOLKINS: The Bates number on the  
13 first page of this document is GA00649808.

14 BY MR. HOLKINS:

15 Q The most recent email in this thread is  
16 from you. It's dated September 20, 2019, to Dante  
17 McKay.

18 I want to give you a moment to familiarize  
19 yourself with the emails. Just for your reference,  
20 we're going to be talking about only Dante's --  
21 Dante McKay's email dated September 29, 2019, and  
22 your response.

23 I'll give you control.

24 A Thank you. I need a minute on this one  
25 because it's not fully ringing a bell.

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1 (Witness reviews exhibit.)

2 A Okay.

3 Q Have you reviewed the exhibit?

4 A I have.

5 Q So I'm going to go ahead and take control  
6 back.

7 A Okay.

8 Q I want to move up in the thread to Mr.  
9 McKay's email addressed to you dated September 20,  
10 2019.

11 That's what I'm showing on the screen now.  
12 Do you see it?

13 A I do.

14 Q He references Georgia's Project LAUNCH  
15 grant focused on Muscogee. Do you see that?

16 A Yes.

17 Q What is Project LAUNCH?

18 A Project LAUNCH is a grant that I believe  
19 happened through SAMHSA. It is no longer in  
20 progress, but it was to focus in on providing  
21 connections and socioemotional services for younger  
22 children, and it was happening in Muscogee County.

23 I was not involved in Project LAUNCH.  
24 Angie Snyder was the one who was overseeing that  
25 work.

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1 Q My understanding, based on this email, is  
2 that this grant was implemented only in Muscogee  
3 County; is that correct?

4 A Yes.

5 MR. BEDARD: Object to form.

6 Q Let me just rephrase.

7 In Georgia the Project LAUNCH grant  
8 focused on Muscogee County exclusively, correct?

9 MR. BEDARD: Object to form.

10 A Yes, yes. Project LAUNCH is a larger kind  
11 of national mechanism in terms of through SAMHSA in  
12 doing some of this work. But, yes, in Georgia this  
13 was done in Muscogee.

14 Q Had Project LAUNCH grants been implemented  
15 in counties other than Muscogee in Georgia?

16 A I don't believe so. But I -- I'm just not  
17 sure.

18 Q Okay. What was being envisioned in this  
19 discussion between Dante McKay and you?

20 MR. BEDARD: Object to form.

21 A I'm having to think back here. This was  
22 an opportunity that I think Jen Kaminski at CDC  
23 raised about potentially putting forth a proposal  
24 through CDC to augment mental health, and that there  
25 may have been some funding available.



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1 It did not come to fruition.

2 Q Why not?

3 A I'm not sure. I know that -- I believe,  
4 and I would have to look back, that the proposal  
5 kind of went up chains and was being reviewed, but I  
6 don't remember hearing back from Jen in terms of  
7 moving forward.

8 And it may be because it was right around  
9 the time that COVID happened and some of those  
10 things kind of had a standstill. But I don't know  
11 the reasons behind it.

12 Q Did you have --

13 MS. COHEN: Patrick, excuse me. I'm  
14 hearing this is Exhibit 344 that you're talking  
15 about.

16 MR. HOLKINS: This is actually 343, and  
17 the reason why is because there was an  
18 attachment to my previous email that we did not  
19 introduce.

20 MS. COHEN: Got it. Let me ask folks who  
21 are giving me that advice.

22 Sandra, ask her. She's on Zoom.

23 MR. HOLKINS: But I'm sure.

24 MS. COHEN: Okay.

25 MR. HOLKINS: And more importantly, so is

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1 Wanda.

2 MS. COHEN: If Wanda is sure.

3 BY MR. HOLKINS:

4 Q Did you have any discussions with  
5 Commissioner Fitzgerald about expanding the Project  
6 LAUNCH grant to other counties in Georgia?

7 A I did not personally. I think Dante had  
8 the conversations with Commissioner Fitzgerald.

9 Q I think you testified that this was  
10 reviewed up the chain. What are you referring to?

11 A What I meant was that the proposal was put  
12 together -- Jen put together the proposal and sent  
13 to some of the folks at CDC. And so it needed to be  
14 reviewed and approved, and I'm not quite sure where  
15 it landed.

16 Q Did you hear anything more back from the  
17 CDC contact regarding the status of this proposal?

18 A That's what I was mentioning. If I recall  
19 back, that there were some emails about it still  
20 being reviewed, but I don't remember getting an  
21 email that it was not happening. I know it didn't  
22 happen because we haven't moved forward.

23 Q I was trying to understand your previous  
24 testimony about Project LAUNCH broadly. Did you say  
25 that that grant has been discontinued?

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1           A       So the Project LAUNCH grant that, that  
2 Georgia had, yes. I can't remember the exact year  
3 when it ended. It was going on when I first started  
4 with Georgia State University, but I believe it  
5 ended several years ago.

6           Q       So the Project LAUNCH grant operated by  
7 SAMHSA nationally is still available, correct?

8           A       I believe so.

9           Q       To your knowledge, Georgia is not pursuing  
10 that grant currently?

11          A       We are not involved. I don't know if  
12 there are other folks, other agencies who may have  
13 pursued a Project LAUNCH grant.

14          Q       And to the best of your knowledge, sitting  
15 here today, do you know whether any state agency in  
16 Georgia is pursuing a Project LAUNCH grant?

17          A       I don't -- I don't -- I don't know.

18          Q       If DBHDD were working on a project grant  
19 application, would you expect them to tell you?

20                 MR. BEDARD: Object to form.

21          A       I would expect them to tell us if they  
22 wanted to partner with us on that. If they were  
23 partnering with others, then they may not tell us.

24          Q       Has DBHDD, to your knowledge, partnered  
25 with any other organizations as evaluation partners

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1 on federal grants?

2 A On federal -- not to my knowledge.

3 The groups within DBHDD that we work with.  
4 There may be other groups that work with other  
5 universities, yes.

6 Q Let me just reask the question so that  
7 it's clear.

8 To your knowledge, has OCYF partnered with  
9 organizations other than COE as an evaluation  
10 consultant for a federal grant?

11 A I would say for the most part we are  
12 their, their evaluation partner.

13 Q So just to restate the question, are you  
14 aware of OCYF partnering with any organizations  
15 other than COE as an evaluation consultant?

16 A For federal grants?

17 Q For a federal grant.

18 A No.

19 Q And what about for a non-federal grant?

20 A They may -- I know they've worked with  
21 Voices for Georgia's Children to conduct, for  
22 example, some focus group, trying to get some  
23 information, those types of things. But I don't  
24 know in terms of -- I don't know in terms of large  
25 organizations.

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1 Q Could you describe briefly what Voices for  
2 Georgia's Children does?

3 A So that is an advocacy organization in  
4 Georgia for children that focuses on children's  
5 health, on mental health, on safety, on all kinds of  
6 things.

7 Q Let's set this one aside.

8 Give me one second. I'm going to show you  
9 some more documents.

10 MR. HOLKINS: I just published what we're  
11 marking as Exhibit 344.

12 (WHEREUPON, Plaintiff's Exhibit-344 was  
13 marked for identification.)

14 MR. HOLKINS: The first page of this  
15 document is stamped GA03270155.

16 BY MR. HOLKINS:

17 Q From its cover it appears to be an email  
18 from you dated September 29, 2021, to a number of  
19 recipients, and it appears to attach a document  
20 titled "Advancing School Mental Health  
21 Conference\_SBMH, in Georgia and School Climate."

22 I'll give you a moment to review the  
23 document, if you like, and just let me know when  
24 you're finished.

25 (Witness reviews exhibit.)

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1 A Okay. I'm finished.

2 Q Are you finished?

3 A Yes.

4 Q Thank you. I'm going to take back control  
5 of the document and scroll to the top.

6 So if I'm not mistaken, this email is  
7 about a presentation concerning the article that we  
8 discussed earlier concerning Apex and school  
9 climate, correct?

10 A Yes, correct.

11 Q And that's an article that you co-wrote  
12 with Garry McGiboney and a number of other  
13 individuals. Is that accurate?

14 A Yes. I was the lead author and then I  
15 wrote it with staff, my staff, and then we included  
16 our partners that are listed here at DBHDD, and  
17 Garry McGiboney was the representative at DOE.

18 Q Did you seek out Dr. McGiboney as a  
19 partner in drafting this article?

20 A Yes.

21 Q Why?

22 A Because he has been -- or was a partner.  
23 He was one of our go-to people at the Department of  
24 Education and I respect his expertise.

25 And so because Apex is a partnership

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1 between behavioral health and education, I thought  
2 it was important to involve all the relevant  
3 partners.

4 Q Dr. McGiboney is no longer employed by the  
5 Department of Education; is that accurate?

6 A That's accurate.

7 Q Since his departure from the Department of  
8 Education, who at GaDOE serves as your go-to?

9 MR. BEDARD: Object to form.

10 A I would say we don't have someone that we  
11 connect with as much. I would say probably the  
12 person -- and it's not me as much as the Apex group,  
13 is probably Ashley Harris.

14 Q So you note in your email dated 9/29/2021  
15 that you are attaching a draft of slides for review  
16 and feedback.

17 These are slides about the article --

18 A Yes.

19 Q -- that we just discussed, correct?

20 A Yes.

21 Q I'm going to pull up those slides. Give  
22 me one second and I'll show them to you.

23 MR. HOLKINS: I've just published what  
24 we're marking as Exhibit 345.

25 (WHEREUPON, Plaintiff's Exhibit-345 was

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1 marked for identification.)

2 MR. HOLKINS: This is a native file  
3 version of the document produced by the State  
4 of Georgia to the United States in this matter  
5 with the Bates-stamp GA03270157.

6 BY MR. HOLKINS:

7 Q Do you recognize this document?

8 A Yes.

9 Q What is this document?

10 A These are the slides that were presented  
11 at the Advancing School Mental Health Conference,  
12 that relate to the analysis that we did for the  
13 article that we published, that was a more rigorous  
14 analysis of schools with Apex versus schools  
15 without, and looking at potential association with  
16 school climate over time.

17 Q Just for the record, this was a  
18 presentation that you gave in October of 2021,  
19 correct?

20 A Yes.

21 Q So I want to just walk through the slides  
22 and ask you some specific questions about material  
23 that are on the slides. So we'll just go one by  
24 one.

25 A Sure.



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1 Q I'm scrolling down. We're now on Page 5  
2 of the document.

3 I want to direct your attention to the  
4 text that's to the right of the Georgia Department  
5 of Behavioral Health and Developmental Disabilities.  
6 Specifically it reads: "State agency with oversight  
7 of public mental health system for children, youth  
8 and adults."

9 Do you see that text?

10 A Yes.

11 Q What informed this statement?

12 A This is a slide that the Apex team has put  
13 together to really identify who the core  
14 stakeholders are for the Apex program, and so it's  
15 the, the definition of who DBHDD is. It's,  
16 obviously, been reviewed by them as well.

17 Q By DBHDD staff?

18 A Yes, because they needed to review the  
19 slides and the information that's in them.

20 Q Did Dante McKay specifically sign off on  
21 these slides?

22 A Yes, and he signed off on the paper.

23 Q I want to now direct your attention to the  
24 text corresponding to the Georgia Department of  
25 Education, or GaDOE. Specifically the slide reads:

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1 "State agency that provides publicly available data  
2 regarding the educational outcomes and well-being of  
3 students."

4 What publicly available data regarding the  
5 educational outcomes and well-being of students are  
6 you reference, here?

7 A These are data based on the student  
8 surveys that they administer and handle annually.  
9 So those were the data we were able to use to look  
10 at school climate, and it's available on their  
11 website.

12 Q And did the Center of Excellence receive  
13 any additional data from the Georgia Department of  
14 Education in connection with this article?

15 A I don't believe so. We really pulled the  
16 public data and looked at the way that they  
17 determined school climate and the overall star  
18 rating, which is the school climate index.

19 And so we did pull in not necessarily from  
20 DOE, but we have the Apex data of number of schools  
21 served, number of providers, and those types of  
22 things, that was in addition to the public DOE data.

23 Q So all the DOE data you received in  
24 connection with this article was publicly available,  
25 correct?

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1           A       It's from the school climate -- the  
2 student health survey and the school climate  
3 ratings, yes.

4           Q       Stepping away just for a moment from this  
5 presentation and the underlying article, are you  
6 aware of any data sharing agreement currently in  
7 place between the Center of Excellence and the  
8 Department of Education?

9           A       No. We would like to -- I think there  
10 have been discussions around that, but we don't have  
11 an official agreement.

12          Q       Why would you like to have such an  
13 agreement?

14          A       I think the discussions have been it would  
15 be helpful in terms of evaluation. To be able to  
16 also look at -- there are some data around the  
17 student health survey around suicidal ideation and  
18 those types of things that we thought would also be  
19 helpful to pull in.

20                   And so, yeah.

21          Q       Would it have been -- what's your  
22 understanding of the barriers to achieving a data  
23 sharing agreement with the Georgia Department of  
24 Education and the Center of Excellence?

25          A       I think there's the normal barriers of big

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1 systems and organizations and approvals and, you  
2 know, I think that every agency, rightfully so, has  
3 to look out for their data. Yeah.

4 Q How long have these discussions around a  
5 data sharing agreement between the Center of  
6 Excellence and the Georgia Department of Education  
7 been occurring?

8 A A couple of years.

9 Q So at least dating back to 2020? Is that  
10 accurate?

11 A I think so. Not necessarily formal  
12 conversations. Informal conversations. And those  
13 who are more involved in the Apex program can  
14 probably give more specific details.

15 Q Who at the Georgia Department of Education  
16 has been involved in these discussions around  
17 developing the data sharing protocol?

18 A I believe it's Ashley Harris.

19 Q I'm scrolling down to Slide 9, which is  
20 titled, "Apex Growth Across 5 years (2015-2020)."

21 Do you see the slide that I'm referencing?

22 A I do.

23 Q The third image on the right, and the text  
24 underneath it represents that there has been a "238%  
25 increase in services provided in schools from Year 1

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1 to Year 5." Correct?

2 Is that accurate?

3 A Yes, I believe it is.

4 Q Where did you receive this data?

5 A Those are data that we have collected over  
6 the years in terms of the agencies provide monthly  
7 reports, in terms of number of schools served, and  
8 these are looked at periodically and then annually.

9 So that the team -- I am not directly  
10 involved, but the team then pulls together the data  
11 on number of students -- number of schools, number  
12 of students receiving first time services, and  
13 number of services provided, and then looking at the  
14 increase over time.

15 Q As part of that effort, does the Center of  
16 Excellence undertake any analysis of the amount,  
17 frequency or duration of services received through  
18 the Apex program by students?

19 A In terms of number of services, yes. In  
20 terms of how long the kids are seen for, I don't  
21 believe that we're collecting that. That may be  
22 something that they are moving to collect, and those  
23 more intimately involved in the program could answer  
24 that.

25 Q There's nothing on this slide, and correct

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1 me if I'm mistaken, that would speak to amount,  
2 frequency or duration of service for children who  
3 are enrolled in the Apex program?

4 A In terms of -- no, not in terms of, you  
5 know, how many times a month a child was seen or for  
6 how long they were seen.

7 Q For the -- moving just to the center, the  
8 -- excuse me -- the image in the middle of the page  
9 and the corresponding text, which reads: "100%  
10 increase in students receiving first-time services  
11 from Year 1 to Year 5."

12 Do you see that text?

13 A Yes.

14 Q Is it possible that a student could  
15 receive one service --

16 MR. HOLKINS: Let me rephrase.

17 Q Is it possible that each student enrolled  
18 in Apex could receive one unit of service and that  
19 would qualify that student as a first-time recipient  
20 for purposes of this data?

21 MR. BEDARD: Object to form.

22 A That's a great question. I would have to  
23 go back to see how they define. I know that there  
24 are definitions in terms of how long the school is  
25 involved in the program.

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1 In terms of whether a student received  
2 one, two times, three times, I don't believe that  
3 that is entered into this number. First-time  
4 students are described as those who haven't received  
5 any type of mental health treatment in the past.

6 Q But to be -- to qualify as a first-time  
7 student, how much service do you have to receive?

8 A It's a great question. I think any  
9 services, but I'm not positive about that.

10 Q I want to now dig into the results of the  
11 study which you report in this presentation.

12 I'd like to start with Page 14. The title  
13 for this slide is: Means School Climate, Star  
14 Rating from Baseline to Endline for Apex and  
15 non-Apex Schools."

16 With the understanding that we're not  
17 researchers, could you help explain in layman's  
18 terms what this slide shows?

19 A Yes. So the overall star rating is the  
20 main school climate index that takes into account  
21 attendance, discipline, all those pieces put  
22 together. And there are elaborate instructions on  
23 the DOE website about how that's computed.

24 A higher rating means more positive school  
25 climate. So we have two matched groups here. We

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1 have the Apex group and then we were able to pull a  
2 similar number of schools that did not receive Apex  
3 but that were matched on things like receiving free  
4 and reduced lunch, type of school, those types of  
5 things.

6 Because we weren't able to do a randomized  
7 control trial, we still wanted to be able to see  
8 more rigorously the impact Apex might have.

9 So what you see on this slide is that from  
10 baseline in 2015 to endline 2019, over those four  
11 years, those schools that received Apex had a  
12 significantly greater increase in their school  
13 climate, positive increase in their school climate,  
14 than those schools that did not receive Apex.

15 Q Thank you.

16 Just as a practical matter, what's the  
17 difference between a 4.04 school climate rating and  
18 a 3.92 school climate rating?

19 A It's just a matter of kind of where it  
20 falls on the star rating. I would have to go back  
21 in terms of -- obviously, 1 is poor and 5 is best,  
22 and then it's somewhere in between.

23 What we looked at a little bit more, too,  
24 was the actual increase over time.

25 Q Between 2015 and 2019?



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1 A Uh-hum. (Affirmative.)

2 Q Is that a yes?

3 A Yes. I'm sorry.

4 Q So I would ask that you provide the same  
5 service with respect to the slide. Could you  
6 describe -- we're know on Page 15 of the PowerPoint.

7 Could you describe what this slide shows?

8 A Yes. So this is a slide that is looking  
9 at student discipline rate. And so if it's -- if  
10 the index is going up, it's a more positive rate,  
11 which means that there were fewer disciplinary  
12 incidents over time. It's a little bit  
13 counterintuitive, but that's the way it's measured.

14 What you see in this slide is that those  
15 schools involved in Apex had a significantly greater  
16 increase in time in terms of positive discipline  
17 rate. So they had a greater decrease in  
18 disciplinary incidents than those schools not  
19 involved in Apex, whose discipline rate actually  
20 went down slightly.

21 Q Thank you. Let's move on to the next  
22 slide, which is Slide 16.

23 The title is "Means Student Attendance  
24 Rate from Baseline to Endline for Apex and non-Apex  
25 Schools."

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1 Can you describe what this slide shows?

2 A Yes. Similarly looking from baseline to  
3 endline, what we saw were that those schools that  
4 were involved in Apex had a significantly positive  
5 increase and a better attendance rate over time than  
6 those schools not involved in Apex. So in terms of  
7 students missing school for a variety of reasons.

8 Q I'm not going to ask you to explain this  
9 one because I think we would be here for a long  
10 time, but let me just see if I have any more  
11 questions on this document.

12 A Sure.

13 Q I do want to show you one more thing in  
14 the Summary of Key Findings section --

15 A Yes.

16 Q -- of the presentation.

17 The presentation reads: "Length of  
18 program participation was not significantly  
19 associated with school climate."

20 Could you explain that finding?

21 A I can give our hypothesis around that.

22 So we looked at, in terms of those schools  
23 participating in Apex, whether there was a  
24 relationship between the length of time in the  
25 program and an increase in positive school climate.

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1 We did not see that those were associated in our  
2 analyses.

3 One potential idea is that schools may  
4 have started at different times and had different  
5 levels of sophistication in terms of their program,  
6 which may have impacted a little bit -- may have  
7 diluted the relationship between length of  
8 participation and the outcome.

9 Q So let's set this aside.

10 Are you aware of whether DBHDD policy  
11 allows for GNETS facilities to participate in the  
12 Apex program?

13 MR. BEDARD: Object to form.

14 A I do not know what their policies say. I  
15 know that there have been, I believe, one or two  
16 schools in the list of schools participating, but I  
17 don't have any of the details.

18 Q What are the schools that you can recall,  
19 the GNETS facilities that can you recall that have  
20 participated in Apex?

21 A I don't know the answer to that. I don't  
22 know the names.

23 Q Is it your recollection that it's no more  
24 than one or two? Is that accurate?

25 A That's my recollection, but for my

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1 accurate information, I would speak with those who  
2 are really involved in the program.

3 Q What was the time frame, if you can  
4 recall, for when GNETS facilities were participating  
5 in Apex?

6 A I don't know.

7 Q And sitting here today. Are you aware of  
8 any single GNETS facility that is able to enroll in  
9 the Apex program?

10 MR. BEDARD: Object to form.

11 A I don't know if the same schools that were  
12 involved initially are still currently participating  
13 or not. I don't have that level of detail.

14 Q Do you have any reason to believe that  
15 GNETS facilities would not benefit from the same  
16 advantages of participating in Apex as you observed  
17 through this study in other schools?

18 MR. BEDARD: Object to form.

19 A Do I have any -- let me make sure I  
20 understand your question.

21 Q Sure.

22 A I don't believe there's any reason that  
23 they would not benefit.

24 Q So on the topic of GNETS, I just want to  
25 run through some questions.

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1 Do you have any duties in your capacity at  
2 the Center of Excellence or the Health Policy Center  
3 with respect to the GNETS program?

4 A No. The only thing is what we talked  
5 about briefly before, where I believe that some of  
6 my staff were working with the South Metro. That's  
7 the only.

8 Q That's the only involvement that you can  
9 recall for the entire Center of Excellence, correct?

10 A Yes.

11 Q And personally you've not had any direct  
12 involvement with the GNETS program in your capacity  
13 at the Center of Excellence?

14 A No.

15 Q Are you familiar with the behavioral  
16 health services and interventions that are made  
17 available to students enrolled in the GNETS program?

18 A No. I don't know the level and a lot of  
19 the details about the GNETS programs themselves.

20 Q Have you ever received or reviewed any  
21 data in connection with the GNETS program?

22 A No.

23 Q Has any state agency staff ever requested  
24 that the Center of Excellence or you directly  
25 perform analysis with respect to the GNETS program?

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1 A Not to my knowledge, no.

2 Q Have you ever visited a GNETS facility?

3 A No.

4 Q Do any staff at the Center of Excellence  
5 visit GNETS facilities as a matter of course?

6 A I don't believe so. Aside from -- aside  
7 from potentially the training that may have happened  
8 around wraparound with South Metro.

9 MR. HOLKINS: So I think we can take just  
10 a brief break, five minutes, and then we'll  
11 kind of talk. I have maybe just a few more  
12 questions, perhaps a document or two, but I  
13 think we'll be able to end before 6:00.

14 We can go off the record.

15 THE VIDEOGRAPHER: Off the record at 5:22  
16 p.m.

17 (A recess was taken.)

18 THE VIDEOGRAPHER: Back on the record at  
19 5:29 p.m.

20 BY MR. HOLKINS:

21 Q So I'd like to show you just a few more  
22 documents. Give me one second and I will pull them  
23 up.

24 MR. HOLKINS: I've just published what  
25 we're marking as Exhibit 346.

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1 (WHEREUPON, Plaintiff's Exhibit-346 was  
2 marked for identification.)

3 MR. HOLKINS: The Bates-stamp for this  
4 document is GA00401660.

5 BY MR. HOLKINS:

6 Q It appears to be an email from you dated  
7 October 26, 2015, with the subject "Slides for New  
8 Orleans Presentation," and attaches a PowerPoint.

9 I will give you a moment to review this  
10 document. I know it's from 2015, and please let me  
11 know when you're finished.

12 (Witness reviews exhibit.)

13 A Okay.

14 Q If I'm not mistaken, the topic of this  
15 email is a presentation you were preparing to give  
16 along with Deborah Gay and Matt Yancey. Is that  
17 correct?

18 A That's correct.

19 Q Who is Deborah Gay?

20 A Deborah Gay was our first contact over at  
21 the Department of Education, and she also was at one  
22 time co-chair of the Interagency Directors Team as  
23 well.

24 I believe she retired.

25 Q Do you recall when she retired?

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1           A       I don't. All the years are running  
2 together.

3           Q       Who is Matt Yancey?

4           A       So Matt Yancey was in the position that  
5 Dante McKay has now. Back in 2015 -- I'm not sure.  
6 He was there for maybe a year, but he was our OCYF  
7 point of contact at that time, and the whole idea  
8 behind Apex actually initiated with him.

9           Q       So I'd like to show you the slides that  
10 you attached to this email. Give me one second and  
11 I will pull them up.

12                   MR. HOLKINS: I just published Exhibit  
13 347.

14                   (WHEREUPON, Plaintiff's Exhibit-347 was  
15 marked for identification.)

16                   MR. HOLKINS: This is a native file  
17 version of the document produced by the State  
18 of Georgia to the United States in this  
19 litigation with the Bates-stamp GA00401661.

20 BY MR. HOLKINS:

21           Q       I realize this is a little small. Let me  
22 see if I can make it bigger.

23           A       Thank you.

24           Q       That's better?

25           A       Thank you.



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1 Q Do you recognize this document?

2 A I do. I'm embarrassed to say I don't  
3 remember a whole lot about it back from 2015.

4 Q So we'll just walk through the slide one  
5 by one. I'll ask you a few questions about the  
6 text.

7 A Okay.

8 Q First, let's just start with the title  
9 page, which identifies this as a presentation given  
10 in November 2015 at the 20th Annual Conference on  
11 Advancing School Mental Health.

12 Correct?

13 A Yes.

14 Q This was a presentation you gave with  
15 Deborah Gay and Matt Yancey, correct?

16 A Yes.

17 Q The title of the presentation is "The  
18 Georgia School-based Mental Health, Community Level  
19 Partnerships and Research to Further School-based  
20 Mental Health."

21 Is that accurate?

22 A Yes.

23 Q I wanted to direct your attention to the  
24 third bullet on this page of the presentation, which  
25 is the third page. The bullet reads -- first the

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1 title of this slide is "Why School Based Mental  
2 Health?"

3 The third bullet reads: "Reduces access  
4 issues, particularly in rural areas, and decreases  
5 stigma by normalizing mental health treatment."

6 Could you expand on how school-based  
7 mental health reduces access issues, particularly in  
8 rural areas?

9 A Sure. The idea that school is where -- is  
10 where children spend -- they spend the majority of  
11 their time, and to be able to have children access  
12 mental health issues and also within the culture to  
13 have mental health normalized, have those  
14 conversations happen, it reduces access -- it  
15 reduces access issues because it's not reliant on a  
16 parent having to bring the youth to each session.  
17 They can be seen within the school, obviously with  
18 parental consent.

19 I think particularly in rural areas where  
20 there may be a lot of distance between providers and  
21 all of that as well, it just helps to centralize  
22 service somewhat.

23 Q Let's scroll back to that same slide.

24 Is expanding school-based mental health  
25 services a part of the mission of the Center of

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1 Excellence?

2 A Yes, in partnership with the other  
3 agencies that we work with.

4 Q So is that part of the mission for the  
5 Center of Excellence driven by the State agencies,  
6 or is that independently a goal for the Center of  
7 Excellence?

8 MR. BEDARD: Object to form.

9 A It's independently a goal for the COE. We  
10 believe in the benefits of school-based mental  
11 health.

12 Q And what is that based on?

13 A It's based on some of the research that  
14 we've done. It's based on a review of the  
15 evidence-based and the research that is out there.  
16 It is based on the idea of needing to find creative  
17 ways to provide access to children for mental health  
18 needs, particularly as these needs increase.

19 Q So you reference the evidence-based, the  
20 research as part of school-based mental health?

21 A Uh-hum. (Affirmative.)

22 Q Could you describe broadly what the  
23 research shows?

24 A There is -- there are a lot of different  
25 models of school-based mental health. There is the

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1 Apex program. There are -- embedding within school  
2 based health centers.

3 There is research out there in addition to  
4 ours around the relationship between school-based  
5 mental health services, helping to improve overall  
6 school climate.

7 I think there are some studies that have  
8 looked at improving student outcomes. We have not  
9 been involved in those particularly.

10 Q Just to make sure I'm clear, there have  
11 been studies showing improved outcomes for children  
12 who receive school-based mental health services; is  
13 that accurate?

14 A Yes, I believe so.

15 Q Are you aware of any studies showing  
16 improved outcomes for students who are enrolled in  
17 GNETS facilities?

18 A I'm not aware of any studies. I haven't  
19 really looked for those.

20 Q Has the Center of Excellence ever studied  
21 the effectiveness of services provided --

22 MR. HOLKINS: Let me try again.

23 Q Has the Center of Excellence ever studied  
24 whether children enrolled in GNETS receive --  
25 experience better outcomes?

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1 MR. BEDARD: Object to form.

2 A No.

3 MR. HOLKINS: Thank you for indulging us.

4 BY MR. HOLKINS:

5 Q Is it fair to say that the GNETS program  
6 is not the kind of school-based mental health  
7 service that has been the subject of the Center of  
8 Excellence's research?

9 MR. BEDARD: Object to form.

10 A That is fair to say.

11 Q Likewise, is it fair to say that the GNETS  
12 program has not been the kind of school-based mental  
13 health service that's been the subject of the other  
14 research that you've seen?

15 MR. BEDARD: Object to form.

16 A That's fair to say. Of the research that  
17 I have reviewed, there's not been a focus on GNETS.

18 Q Are you aware of any evidence-based  
19 supporting provision of behavioral health services  
20 and interventions in GNETS schools?

21 A No. I haven't looked for that.

22 Q Has anyone at the Department of Behavioral  
23 Health and Developmental Disabilities requested that  
24 you look for that research?

25 A No.

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1 Q You testified that you've not looked for  
2 research regarding any evidence-base and support of  
3 the GNETS model; is that accurate?

4 A That's correct.

5 Q Why not?

6 A That has not been a focus of one of the  
7 models we've been looking at.

8 We focused on -- I mean our, our work with  
9 the State has been around the Apex program, which is  
10 a specific model of integrating a community provider  
11 within the schools.

12 I think there are others who are doing  
13 models around the -- having more of a health unit  
14 within the schools, in which mental health is a part  
15 of that.

16 But I guess that's just not something that  
17 we've engaged in research around, nor have we been  
18 asked to engaged in research around GNETS.

19 Q Just to be clear, providing therapy  
20 interventions in a segregated setting has not been  
21 the subject of any research by the Center of  
22 Excellence?

23 MR. BEDARD: Object to form.

24 A Not within a school setting. I think, as  
25 we talked about previously, some of the work, the

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1 monitoring and evaluation that Susan and her team  
2 have been involved in around Crisis Stabilization  
3 Units, PRTFs, but those are not GNETS.

4 Q Right. Thank you for drawing that  
5 distinction.

6 Between a segregated treatment facility  
7 versus a segregated educational facility, which is  
8 what GNETS is, correct?

9 A Yes.

10 Q And just to restate the question, you're  
11 not aware of any --

12 MR. HOLKINS: Actually, withdraw that.

13 Q In your mind, what distinguishes  
14 school-based mental health services as you've  
15 studied from the services that are provided in a  
16 GNETS setting?

17 MR. BEDARD: Object to form.

18 A I will answer to the best of my ability  
19 given that I don't know fully what that whole GNET  
20 program entails. But I think the differences are --  
21 my understanding is in a GNETS program you have  
22 youth that have been referred from local schools,  
23 who then are in a school -- a school setting with  
24 each other, and they receive more intensive  
25 behavioral health, socioemotional health services in

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1 addition to their education.

2 The school-based mental health programs  
3 that we're talking about are in regular public  
4 schools in which mental health is integrated into  
5 the culture and the community-based providers  
6 provide services within that school setting.

7 Q Are there advantages to integrating those  
8 services, as you said, into the culture of a general  
9 education facility?

10 MR. BEDARD: Object to form.

11 A In my opinion, I believe so. I believe  
12 that integrating mental health services within the  
13 schools helps to address access issues and can help  
14 to reduce stigma, as we've talked about in terms of  
15 normalizing some of those conversations.

16 Q I want to direct you to another slide.  
17 This is Slide 5.

18 The title of the slide is "Environmental  
19 Scan on School Based Mental Health: Results that  
20 informed Georgia's efforts."

21 Could you describe the environmental scan  
22 that's referenced in this slide?

23 A I can. I was not the one who completed  
24 it. It was the Apex staff who were involved, so I  
25 won't be able to provide details.



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1 But basically we did a review of folks who  
2 were doing school-based mental health in Georgia.  
3 We also looked at South Carolina as a model, and  
4 they have got a lot of school-based mental health  
5 work happening, and some of these other states here.

6 And then also looked -- we also have a  
7 technical -- technical transfer center. It's funded  
8 through -- I believe it's funded through SAMHSA,  
9 that also does some school-based mental health work  
10 in Georgia, and just tried to pull together across  
11 what we were seeing what, what common and effective  
12 models might be to help inform services.

13 I think that's where we also learned that  
14 the more integrated a provider is within that school  
15 setting, the more effective they might be.

16 Q Were the results of this environmental  
17 scan published by the Center of Excellence?

18 A We have a brief that identifies the  
19 results from this. The full kind of 40-page report  
20 was not put out there, but there is a brief that  
21 puts those results out there.

22 Q The full 40-page report, was that  
23 circulated to staff at OCYF?

24 A I believe so, because it helped to inform  
25 the efforts.

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1 Q So I'm going to scroll a few slides down,  
2 to Slide 9.

3 I want to direct your attention first to  
4 the title: "Role of Community Partners," and to the  
5 first billet, which reads: "SBMH is an inherently  
6 collaborative process."

7 SBMH stands for school-based mental  
8 health, correct?

9 A Yes.

10 Q Could you expand on this statement?

11 MR. BEDARD: Object to form.

12 Q So let me reask. Why is school-based  
13 mental health an inherently collaborative process?

14 A It is an inherently collaborative process,  
15 this relates to the title of the presentation around  
16 System of Care as well, in that again it's the  
17 involvement of multiple partners around this  
18 conversation about mental health and normalizing  
19 mental health.

20 So if you have all these different  
21 organizations here who are in support of and  
22 promoting this work, again it's talking about  
23 advocating for services within the schools. And so  
24 talking about an overall System of Care, holistic  
25 care for the youth.

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1 Q I think we can put this document aside for  
2 now.

3 How would you describe the role broadly of  
4 the Center of Excellence in Georgia's System of Care  
5 for children and adolescents with behavioral health  
6 conditions?

7 A The Center of Excellence has a very  
8 central role in Georgia's center of care.

9 We have brought on board, I believe it was  
10 in 2019, the director of System of Care, who really  
11 oversees and chairs the Interagency Directors Team.

12 We have been integrally involved in  
13 working with the IDT to develop the state plan,  
14 System of Care State Plan for behavioral health.  
15 They're in their second iteration, and school-based  
16 mental health is a part of that plan.

17 So we do a lot of backbone research,  
18 facilitation, bring groups together. There are  
19 multiple work groups who are addressing some of  
20 those pieces of scopes of work, and we have a staff  
21 that works very closely on that.

22 Q Do staff at the Center of Excellence have  
23 a role in shaping strategic planning for  
24 school-based mental health services in the State of  
25 Georgia?

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1           A       We have a role in consulting and being  
2 part of collaboratives and leadership committees  
3 that can inform those conversations, yes.

4           Q       Is it fair to say that the State agency  
5 staff are mainly responsible for determining  
6 strategic policy -- excuse me -- strategic planning  
7 for school-based mental health services in Georgia?

8                   MR. BEDARD: Object to form.

9           A       It depends on the program. For a  
10 statewide state funded program, yes, they would be  
11 responsible for, for funding and for doing the  
12 strategic policy for that.

13                   If it is another organization who is  
14 providing services around school-based mental  
15 health, then maybe not.

16           Q       Is it fair to say that the work of the  
17 Center of Excellence in expanding school-based  
18 mental health services in Georgia depends upon a  
19 close relationship with the child-serving agencies  
20 in the State?

21           A       Yes.

22           Q       I'm going to ask you some questions about  
23 your preparation for the deposition. I'm not asking  
24 you to reveal any -- the substance of any  
25 communications that you had with your attorney in

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1 preparation for the deposition.

2 With that preface, what did you do to  
3 prepare for today's deposition?

4 A The only thing I did to prepare was to  
5 meet once with Ed Bedard.

6 Q And Mr. Bedard is your attorney for  
7 purposes of this deposition, correct?

8 A Yes.

9 Q Did you review any documents --

10 A No.

11 Q -- in preparation?

12 A No.

13 MR. HOLKINS: Let me just quickly confer.

14 I think that we're done. Thank you very  
15 much for your time.

16 THE WITNESS: My pleasure.

17 MS. COHEN: It was a pleasure to meet you.

18 MR. HOLKINS: If you have questions.

19 MR. BEDARD: If I can take one minute.

20 Nobody needs to go anywhere.

21 THE VIDEOGRAPHER: Stay on the record?

22 MR. BEDARD: We can go off the record for  
23 a second.

24 THE VIDEOGRAPHER: Off the record at 5:51

25 p.m.

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1 (Discussion ensued off the record.)

2 THE VIDEOGRAPHER: Back on the record at  
3 5:53 p.m.

4 EXAMINATION

5 BY MR. BEDARD:

6 Q Thank you, Ms. DiGirolamo. I'm going to  
7 -- hopefully I've got that right.

8 Just one or two questions.

9 Is it fair to say that in your experience  
10 in engaging in strategic planning for school-based  
11 mental health programs that who's responsible for  
12 the strategic planning for any particular  
13 school-based mental health program depends on that  
14 particular program?

15 MR. HOLKINS: Object to form.

16 MR. BEDARD: Let me rephrase.

17 BY MR. BEDARD:

18 Q Is it fair to say that it depends on the  
19 particular school-based mental health program --

20 MR. BEDARD: Strike that.

21 BY MR. BEDARD:

22 Q This is a bit of a long question, so I  
23 want to make sure I'm getting it right and there are  
24 a lot of words.

25 Is it fair to say that determining who is

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1 responsible for strategic planning for school-based  
2 mental health for any particular school-based mental  
3 health program depends on that particular  
4 school-based mental health program?

5 MR. HOLKINS: Same objection.

6 A Yes, I think that's fair to say.

7 Q And is it fair to say that different  
8 people may be responsible for different aspects of  
9 strategic planning for any single school-based  
10 mental health program?

11 A I think that's fair to say.

12 MR. BEDARD: That's all I've got.

13 MR. HOLKINS: Nothing further.

14 Thank you again for your time.

15 MS. COHEN: Thanks very much and thanks  
16 for all the courtesies.

17 THE VIDEOGRAPHER: Off the record at 5:55  
18 p.m.

19 (Whereupon, the deposition concluded at  
20 5:55 p.m.)  
21  
22  
23  
24  
25

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C E R T I F I C A T E

STATE OF GEORGIA:

FULTON COUNTY:

I hereby certify that the foregoing transcript of ANN M. DiGIROLAMO was taken down, as stated in the caption, and the questions and answers thereto were reduced by stenographic means under my direction;

That the foregoing Pages 1 through 95 represent a true and correct transcript of the evidence given upon said hearing;

And I further certify that I am not of kin or counsel to the parties in this case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

IN WITNESS WHEREOF, I have hereunto subscribed my name this 5th day of August, 2022.

*Wanda L. Robinson*

Wanda L. Robinson, CRR, CCR No. B-1973  
My Commission Expires 10/11/2023



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D I S C L O S U R E

STATE OF GEORGIA ) VIDEOTAPE DEPOSITION OF  
FULTON COUNTY ) ANN M. DIGIROLAMO - 7/28/22  
Pursuant to Article 10.B of the Rules and  
Regulations of the Board of Court Reporting  
of the Judicial Council of Georgia, I make the  
following disclosure:

I am a Georgia certified court reporter.  
I am here as a representative of Esquire Deposition  
Solutions, LLC, and Esquire Deposition Solutions,  
LLC was contacted by the offices of U.S. Attorney's  
Office to provide court reporter services for this  
deposition. Esquire Deposition Solutions, LLC will  
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that is prohibited by O.C.G.A. 9-11-28 (c).

Esquire Deposition Solutions, LLC has no  
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CERTIFICATE OF DEPONENT

I hereby certify that I have read and examined the foregoing transcript, and the same is a true and accurate record of the testimony given by me. Any additions or corrections that I feel are necessary, I will attach on a separate sheet of paper to the original transcript.

\_\_\_\_\_  
Signature of Deponent

I hereby certify that the individual representing himself/herself to be the above-named individual, appeared before me this \_\_\_\_\_ day of \_\_\_\_\_, 2022, and executed the above certificate in my presence.

\_\_\_\_\_  
NOTARY PUBLIC

MY COMMISSION EXPIRES: